

JASON M. SANTARCANGELO, ESQ. (JS4492)
SANTARCANGELO LAW, L.L.C.
80 PARK STREET, SUITE 2A
MONTCLAIR, NJ 07042
PHONE: (973) 233-5815
FAX: (888)-852-6651
ATTORNEY FOR DEFENDANTS

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

TATYANA PERRONE,

Plaintiff

v.

BIBI METABOLIC AND BARIATRIC
SERVICES, LLC D/B/A WEIGHT LOSS
AND WELLNESS CENTER, SANIEA
MAJID, ALI AHMAD, JOHN DOES 1
through 10, AND ABC CO. 1 through 10

Defendant.

Civil Action No.: 2:20-cv-10587-MCA-LDW

CIVIL ACTION

**NOTICE OF MOTION TO WITHDRAW
AS COUNSEL**

TO: Thomas H. Andrykovitiz, Esq.
260 Madison Avenue, 15th Floor
New York, NY 10017
Attorney for Plaintiffs

Joshua F. MaMahon, Esq.
123 South Avenue East
Westfield, New Jersey 07090
Attorney for Plaintiffs

PLEASE TAKE NOTICE THAT, in accordance with Local Civil Rule 102.1, on December 6, 2021, or as soon thereafter as counsel may be heard, Santarcangelo Law, LLC will move before the Honorable Madeline C. Arleo, United States District Judge, at the United State District Court, Frank R. Lautenberg US Post Office & Courthouse, Court Room MLK 4A, Newark, New Jersey, 07102, for an Order permitting them to withdraw as counsel for the Defendants.

PLEASE TAKE FURTHER NOTICE THAT in support of this motion, Defendants will rely on the accompanying Memorandum of Law and the *in camera* declaration of Jason M. Santarcangelo, Esq.

PLEASE TAKE FURTHER NOTICE THAT, to the extent that the Court requires additional information to decide this motion, the undersigned respectfully request that the Court schedule an

in camera hearing before Judge Wettre, outside presence of all other parties, to ensure that the confidentiality of our clients' information is preserved as required by New Jersey RPC 1.6.

A proposed form of order is submitted along with this motion.

SANTARCANGELO LAW, L.LC

A handwritten signature in black ink, appearing to read 'J M Santarcangelo', is written over a horizontal line.

JASON M. SANTARCANGELO, ESQ.

80 Park Street, Suite 2A

Montclair, New Jersey 07042

Attorney for Defendants

Date: November 4, 2021

CERTIFICATE OF SERVICE

On November 4, 2021, I served a copy of this motion on all counsel of record using the Court's ECF system.

SANTARCANGELO LAW, LLC

JASON M. SANTARCANGELO, ESQ.
Attorney for Defendants